## Case 4:19-cv-01440-JSW Document 170 Filed 06/17/22 Page 1 of 3

			FILED
	IN THE UNITED STATES	DISTRICT COURT	
	FOR THE NORTHERN DISTR	OCH (CO.) (C	JUN 17 2022  CLERK, U.S. DISTRICT COURT
			NORTHERN DISTRICT OF CALIFORNIA
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	PLAINTIFF		
has and with the state of the s		TO PRESERVE THE RIGHT ON APPEAL	PLAINITIFF OBJECT'S TO SEVERAL
	MICKEY PRICE Et. AL.	DEFENDANT'S GRANT OF SUMMAR	Y JUDGEMENT IN ECF # 75 AS
to an exercise an installation commission of convenience of a convenience and	DEFENDANTS	PLAIN ERROR	
		and the second s	
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	MEMORANDUM OF POINTS AND AUTHORITIES		
13		lakuras umanneskojas mijustanadas oliksia sast oleuvas oneti andatas takaides vasita itali hemitari takaina	
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guidenning de réferences equire planes autosphis par parties autosphis autosphis autorité de la company de la comp	WAS PLAIN ERROR AS A MATTER OF LAW		
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J. G	*COURT'S MUST, WHEN POSSIBLE, INTERPRET EACH WORD OF A LAW SO AS TO GIVE IT MEANINGFUL EFFECT", SILVEIRA VS. LOCKYER,		
19 aprenti si uniconingia del morri ngaland i morri la mali sanday and last accopilinas (an esperandora	312 F. 3d. 1052 (914 CIR. 2002). AFFIDAVITS ARE ADMISSIBLE IN SUMMARY JUDGEMENT PROCEEDINGS CONLYD IF THEY ARE		
20	made under penalties of Perjury," meaning that a district court may reject unsworn document's", elder-keep Vs.		
2) and the production of the contract of the c	ASKSAMIT. 460 F. 31 979,984 (814 cir. 2006).	tandeksi (jacika Mendara Arenta in ing kistera kelenti (in ing kistera kelenti) (in ing kelenti) (in ing kelenti)	
<u>22</u>			tide was a citu di visi shiri di demuniri 23 cili wensi (iji ka cisa wir wirwad a wakina cirinta (ili pa a cita Ili pa citu di visi shiri di demuniri 23 cili wensi (iji ka cisa wirwad a wakina cirinta (ili pa a cita di demuniri 23 cili di di di di demuniri 23 cili di
23	DEFENDANTS DEC. 16,2020 NOTICE OF MOTION AND MOT	ION FOR SUMMARY JUDGEMENT PR	REPARED BY MR. BURANICH IS NOT
24	MADE UNDER PENALTY OF PERJURY, IT IS AN UNSWORN DOCUMENT AND THEREFORE INADMISSIBLE EVIDENCE FOR		
25	PURPOSES OF SUMMARY JUDGEMENT AND SHOULD HAVE BEEN REJECTED BY THE DISTRICT COURT SUA SPONTE. GRANTING		
26	VARIOUS DEFENDANTS SUMMARY JUDGEMENT ON INADMISSIBLE EVIDENCE WAS PLAIN ERROR. FOR EXAMPLE, ON APRIL		
	22, 2020 IN A SWORN DECLARATION PREPARED BY COUNSEL BURANICH LITIGATIONS COORDINATOR WENDY REYNOLDS TESTIFIED		
28	THAT TRAINING PROVIDED TO CORRECTIONAL OFFICERS WE	IS CONFIDENTIAL, THIS OF COURSE (	WAS PERJURY, AND THIS INFORMATION

## Case 4:19-cv-01440-JSW Document 170 Filed 06/17/22 Page 2 of 3

Significación commenciar concentration escales concentration de la	IS ACCESSIBLE THROUGH PUBLIC RECORDS. TO MINIZE THEIR TRAINING IN WATSON AND J. FRISK BOTH TESTIFIED TO NOT BEING		
	A PSYCHOLOGIST OR PSYCHIATRIST. OMITTED FROM THEIR TESTIMONY IS A MATERIAL FACT, IN 2017 N. WATSON HAD 13 YEAR'S OF		
	SUICIDE PREVENTION TRAINING AND J. FRISK HAD 16 YEARS OF THAT TRAINING. BOTH N. WATSON AND J. FRISK WERE ON		
supplication and the control of the	NUOTICE THAT THEIR CONDUCT VIOLATED THE LAW AND PLAINTIFF'S CONSTITUTIONAL RIGHT'S, CAL. PEN. COD. \$5058.4 (3) (4) (1) THRU (5).		
Experimental communications of the action of the communication of the co	PLAINTIFF WAS PREJUDICED DUE TO IN ADMISSIBLE EVIDENCE AND PERJURED TESTIMONY.		
	CONCUSION		
8 × × × × × × × × × × × × × × × × × × ×	AT SUMMARY JUDGEMENT ON SEP. 23, 2021 THE DISTRICT COURT HAD A SUA SPONTE DUTY TO REJECT UNISWORN DOCUMENTS. AS		
	A COMPETENT ATTORNEY MR. BURANICH HAD THE PRESENCE OF MIND NOT TO FILE PLEADING'S LINDER PENALTY OF PERJURY BECAUSE DECLARACTIONS		
	CITED BY HIM IN FAVOR OF SUMMARY JUDGEMENT WERE DISHONEST, TO PUT IT MILDLY.		
	VERIFICATION		
	I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE. IF CALLED UPON		
	TO DO SO, I CAN COMPETENTLY TESTIFY TO THESE MATTER'S. THIS DECLARATION WAS EXECUTED ON THE 51" DAY OF JUNE 2022		
	AT STOCKTON CALIFORNIA.		
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## PROOF OF SERVICE BY MAIL [CCP §§ 1013(a), 2015.5]

STATE OF CALIFORNIA, COUNTY OF SAN JOAN	UIN)			
I am a citizen of the County of SAN JOAQUIN	, State of California. I am a citizen			
of the United States of America. I am over the age o				
action. I am a resident of the County of San Joaquin.	, CDCR# <u>T-45537</u> .			
My address is: DANIEL VERDUZCO, T-45537				
California Health Care Facili	ty			
P.O. BOX 32110				
Stockton, CA 95213				
On JUNE 05, 2022, I served via U	United States Mail a copy of the following			
document(s): TO PRESERVE THE RIGHT ON APPEAL PLAINTIFF OBJECT'S TO SEVERAL DEF'S GRANT OF SUMM JUDGE.  IN ECF #75 AS PLAIN ERROR				
The above-noted legal document(s) was place	ed in a sealed envelope, with postage			
thereon fully prepaid, addressed to the person at the	address indicated below pursuant to			
California Code of Civil Procedure Section 1013. I	placed the envelope or package in a			
mailbox or other like facility addressed to:				
OFFICE OF THE CLERK, U.S. DISTRICT COURT	WILLIAM P. BURANICH, DAG			
1301 CLAY STREET, SUITE 400S DAKLAND, CALIFORNIA 94612	455 GOLDEN GATE AVE, SUITE 11000 SAN FRANCISCO, CALIFORNIA 94102			
I declare under penalty of perjury that the	foregoing is true and correct to the			
best of my knowledge. This document was executed	on JUNE 05 , 2022 in San Joaquin			
County, California.				
Type or Print Name	Signature			
Type of Fillervalle	Signature			